



RECEIVED
USDA NATIONAL
ORGANIC PROGRAM

2005 AUG -9 P 3: 27

National Organic Program
USDA-AMS-TMP-NOP
Arthur Neal - Director
1400 Independence Ave. SW
Room 4008-So. Ag Stop 0268
Washington, DC 20250

Fax: 202-205-7808
Docket Number TM-0407

Dear Neal,

This correspondence serves as a petition to include Citric Acid and Ascorbic Acid as outlined in 205.606 and conforming to 205.607 procedures. Citric and Ascorbic acids are currently recognized in 21 CFR parts 184.1033 and 182.8013, respectively, as safe for human consumption. Both of the above items have assigned CAS numbers as follows, 77-92-9 and 50-81-7. Both items from above are commonly found in plant and other tissues in nature. Ascorbic acid is a nutrient used for human consumption commonly known as Vitamin "C". Both products readily dissolve in water and do not present high toxicity risks to the environment. These items are used in our product formulations as additives that help control several functions in these products. Enzymatic browning, setting gel matrix in jams, acidification, and flavor adjustments are completed using the above items. Citric and Ascorbic acids are used in 95% + Organic Products as non-organically produced products for the above stated reasons. Therefore, J Lieb Foods Inc. and many of our customer's, request that Citric Acid and Ascorbic Acid remain on the list as outlined in 205.606, as approved for use in Organic products. J Lieb Foods Inc. purchases these products from Quadra Chemicals Western Inc., 5700 NW Front Ave., Portland, OR 97210, USA. The actual process manufacturing of these items would be considered Confidential Business Information and can be better described by our supplier stated above. If I can answer any further questions or concerns please contact me directly at 503-359-9279, ext 25.

Sincerely,
Clint Crowder
Quality Assurance Manager
J Lieb Foods, Inc.

2250-D 23rd Avenue
P.O. Box 389
Forest Grove, OR 97116
phone 503.359.9279
fax 503.357.7713

"Kickin' Out The Jams!"